

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re: BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff,

Plaintiff,

v.

BAM L.P., MICHAEL MANN, and MERYL
MANN,

Defendants.

Adv. Pro. No. 10-04390 (SMB)

**DEFENDANTS' REPLY TO TRUSTEE'S RESPONSES AND OBJECTIONS TO
DEFENDANTS' [PRELIMINARY DRAFT PROPOSED] TRIAL EXHIBIT LIST**

Michael and Meryl Mann and BAM L.P. (collectively, the "Defendants") hereby respond to the Responses and Objections to Defendants BAM L.P., Michael Mann, and Meryl Mann's [Preliminary Draft Proposed] Trial Exhibit List, filed on June 15, 2020 by Irving H. Picard, as trustee ("Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") and the chapter 7 estate of Bernard L. Madoff ("Madoff").

Preliminary Response

The Defendants have had limited access to documents necessary for this trial because of the Corona Virus pandemic. The Dentons' New York Office has been closed since early March. As a result, counsel has had no access to their files for this adversary proceeding or the BLMIS SIPA proceeding since March except for (a) documents in digital format that can be accessed remotely, (b) other source documents that are available online, and (c) initial disclosure documents re-sent by the Trustee on disk. While the Trustee has unfettered access to the entire BLMIS/Madoff/customer data base with the critical guides and lists thereto, the initial disclosure documents sent by the Trustee were of limited usefulness to the Defendants because the documents were identified only by account number, data size and Bates number and the disks were incomplete. The Trustee's objections to the identification or partial identification of documents the Defendants propose as trial exhibits reflect the difficulties imposed by the restricted, limited access that the Defendants have had for the past three months.¹

¹ By letter dated May 12, 2020 to the Court [Adv. Proc. ECF No. 196], Defendants' counsel described the difficulties imposed by the shutdown and sought an extension of deadlines. The Trustee did not oppose the extension.

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
1-A	509 Account Statements	JPMTAA0000184-186	Stipulated		
1-B		JPMTAA0000220-222	Stipulated		
1-C		JPMTAA0000251-253	Stipulated		
1-D		MADWAA00332939-40	Stipulated		
1-E		JPMTAA0000051-53	Stipulated		
2-A	703 Account Statements	JPMSAB0004463-4	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAB0004455-4517	The Defendants currently have no access to the complete statement for the 703 Account for the period from August 30, 2008 through September 30, 2008. The Trustee has the complete statement.
2-B		JPMSAB0004547	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAB0004518-4570	The Defendants currently have no access to the complete statement for the 703 Account for the period from October 1, 2008 through October 31, 2008. The Trustee has the complete statement.
2-C		JPMSAB0004217-8	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAB0004195-4256	The Defendants currently have no access to the complete statement for the 703 Account for the period from July 1, 2008 through July 31, 2008. The Trustee has the complete statement.

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
2-D		JPMSAB0009515-1567		Document does not exist; Trustee reserves the right to object upon proper identification of the exhibit.	The correct document number is JPMSAB0001515-68.
2-E		JPMSAB0003510-3579	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAB0003510-3580	
2-F		JPMSAB0000152-210	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAB0000152-0211	
2-G		JPMSAB0003129-3179	Stipulated		
2-H		JPMSAB000001-48	Stipulated		
2-I		JPMSAB0004518-4570	Stipulated		
2-J		JPMSAB0009455-		Document does not exist; Trustee reserves the right to object upon proper identification of the exhibit.	The Defendants continue to search for the correct bates number.
2-K		JPMSAB0004195	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAB0004195-4256	
2-L		MADWAA00048071-162	Stipulated		

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
2-M		MADWAA000378499-566		Document does not exist; Trustee reserves the right to object upon proper identification of the exhibit.	The correct document number is MADWAA00378499-566. This is a 703 bank account statement sent to: Bernard L. Maddoff, att: Tony Tilenick., 885 Third Avenue, 18 Floor, New York, New York 10022
2-N		MADWAA000139882-975		Document does not exist; Trustee reserves the right to object upon proper identification of the exhibit.	The correct document number is MADWAA00139882-975. This is a 703 bank account statement sent to: Bernard L. Maddoff, att: Tony Tilenick., 885 Third Avenue, 18 Floor, New York, New York 10022
2-O		MADWAA00378501	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA00378499-8566	
2-P		MADWAA01072688-714	Stipulated		
2-Q		MADWAA00147886-000	Stipulated		
2-R		MADWAA00389854-923	Stipulated		
3-A	BAM Checks	JPMSAF0004164	Stipulated		
3-B		JPMSAF0005242	Stipulated		
3-C		JPMSAF0013968	Stipulated		

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
3-D		JPMSAF0019901	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: JPMSAF0019901-9902	The designation is not incomplete. JPMSAFF0019901 shows the face of the check written from the account of Bernard L. Maddoff.
3-E		JPMSAF0032193	Stipulated		
3-F		JPMSAF0040437	Stipulated		
3-G		JPMSAF0041744	Stipulated		
3-H		JPMSAF0056254	Stipulated		
3-I		JPMSAF0058939	Stipulated		
3-J		JPMSAF0061489	Stipulated		
3-K		JPMSAF0064380	Stipulated		
3-L		JPMSAF0066967	Stipulated		
3-M		MADWAA000048606	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA000048606- 8607	

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
4-A	BAM Account Documents	AMF00267043-51	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: AMF00267004-7081	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk..
5-A	BAM Account Statements	MDPTPP01667946-51	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667946-7969	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-B		MDPTPP01667794-97	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667794-7801	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
5-C		MDPTPP01667750-54	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667750-7769	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-D		MDPTPP01667662-66	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667662-7685	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-E		MDPTPP01667602-06	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667602-7625	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
5-F		MDPTPP01667502-06	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667502-7521	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-G		MDPTPP01677410-14	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01677407-7411	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-H		MDPTPP01667438-42	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667438-7457	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
5-I		MDPTPP01667070-73	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01667070-7085	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-J		MDPTPP01666894-98	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666894-6913	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-K		MDPTPP01666874-77	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666874-6889	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
5-L		MDPTPP01666590-92	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666590-6595	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-M		MDPTPP01666470-76	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666470-6485	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-N		MDPTPP01666338-43	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666338-6349	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
5-O		MDPTPP01666308-13	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666308-6319	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-P		MDPTPP01666069-74	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDPTPP01666069-6086	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
5-Q		MDPTPP01666013-18	Stipulated		
6-A	BAM Portfolio Management Reports	MDPTQQ00159830	Stipulated		
6-B		MDPTQQ00159818	Stipulated		
6-C		MDPTQQ00159807	Stipulated		
6-D		MDPTQQ00159795	Stipulated		
6-E		MDPTQQ00159783	Stipulated		
6-F		MDPTQQ00159771	Stipulated		

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
6-G		MDPTQQ00159759	Stipulated		
6-H		MDPTQQ00159747	Stipulated		
6-I		MDPTQQ00159735	Stipulated		
6-J		MDPTQQ00159723	Stipulated		
7-A	Mann Account Documents	AMF00256536-45	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: AMF00256511-6547	
8-A	Mann Account Statements	MDTPP01254892-97	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254892-4903	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
8-B		MDTPP01254626-34	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254626-4635	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
8-C		MDTPP01254658-63	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254658-4669	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
8-D		MDTPP01254494-97	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254494-4501	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
8-E		MDTPP01254298-303	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254298-4315	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
8-F		MDTPP01254149-54	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254149-4160	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
8-G		MDTPP01254015-22	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01254015-4030	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
8-H		MDTPP01253315-26	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MDTPP01253315-3353	The document is not incomplete. The Defendants' designation is the complete account statement. The Trustee's designation is over inclusive. It includes one or more exact duplicates of the account statement reproduced on the Trustee's disk
9-A	Mann Checks	MADWAA00203642	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA00203642-3643	
9-B		MADWAA00266152	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA00266152-6153	
9-C		MADWAA00306470	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA00306470-6471	
9-D		MADWAA00333863	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA00333863-3864	
9-E		MADWAA00367011	Stipulated subject to Fed. R. Evid. 106, completeness	Incomplete document; Correct bates: MADWAA00367011-7012	

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
10-A	Mann Portfolio Management Reports	MDPTQ00131127	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131127	
10-B		MDPTQ00131116	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131116	
10-C		MDPTQ00131104	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131104	
10-D		MDPTQ00131092	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131092	
10-E		MDPTQ00131080	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131080	
10-F		MDPTQ00131068	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131068	

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
10-G		MDPTQ00131056	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131056	
10-H		MDPTQ00131044	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131044	
10-I		MDPTQ00131032	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131032	
10-J		MDPTQ00131020	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131020	
10-K		MDPTQ00131008	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131008	
10-L		MDPTQ00131984	Stipulated subject to correction of Bates number for identification	Incorrect bates number; Correct bates: MDPTQQ00131984	

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
11-A	U.S. v. Bonventre et al., 10 cr. 00228 (LTS)	Bonventre Sentencing transcript, ECF 1441		Relevancy; Lack of Probative Value	The Bonventre sentencing transcript demonstrates that Daniel Bonventre had been an employee of Madoff for decades and could not properly be referred to solely as a "BLMIS employee." The fact that the 703 Account was deliberately concealed from reporting authorities by Bonventre demonstrates that it was not accidentally left in the name of Madoff or the sole proprietorship..
12-A	U.S. v Peter Madoff, 10 cr 0228 (LTS) June 29, 2012	Peter Madoff Plea Transcript		Relevancy; Lack of Probative Value	Relevant to separate origins and operations of Madoff businesses.
13-A	JPMorgan Chase, End of Day Investment and Loan Sweep Service	www.jpmorgan.com		Require additional information, reserve objection	
14-A	S & P 500 historical performance	www.Macrotrends.net		Require additional information, reserve objection	
15-A	Bernard L. Madoff Investment Securities LLC., Registration of investment advisory business (2006)	advisorinfo.sec.gov		Require additional information, reserve objection	
16-A	Trading records for US Treasury securities	Unavailable due to lack of office access		Require additional information, reserve objection	
17-A	Customer Trade confirmations	Unavailable due to lack of office access		Require additional information, reserve objection	

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
18-A	BAM Investment Returns (9%) chart	Unavailable due to lack of office access		Lack of foundation; improper expert opinion; authentication; require additional information, reserve further objection	The Defendants are not making a claim to recover damages. They have applied a simple percentage increase to the deposits in their account, consistent with market performance during the period, to establish that had they invested in the same basket of stocks with a legitimate broker, they would not have lost all or a significant part of the balance showing in their account on November 30, 2008. These are facts that do not require expert testimony, and that are relevant to weighing the fairness and relative equities of the parties in considering an award of pre- judgment interest to the Trustee, ² where the Defendants must be treated as innocent victims of the fraud.

² *Wickham Contracting Co. Inc. v. Local Union No. 3, Int'l Bhd. Of Elec. Workers, AFL-CIO*, 955 F.2d 831, 834 (2d Cir. 1992) (“Wickham”).

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
19-A	Mann Investment Returns (9%) chart	Unavailable due to lack of office access		Lack of foundation; improper expert opinion; authentication; require additional information, reserve further objection	The Defendants are not making a claim to recover damages. They have applied a simple percentage increase to the deposits in their account, consistent with market performance during the period, to establish that had they invested in the same basket of stocks with a legitimate broker, they would not have lost all or a significant part of the balance showing in their account on November 30, 2008. These are facts that do not require expert testimony, and that are relevant to weighing the fairness and relative equities of the parties in considering an award of prejudgment interest to the Trustee, ³ where the Defendants must be treated as innocent victims of the fraud.

³ *Wickham*, 955 F.2d at 834.

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
20-A	Tax Cost Analysis-Mann	002310-211		Relevancy; Lack of Probative Value	<p>The Defendants propose the tax returns as evidence of their significant losses incurred for unrecouped taxes paid on alleged profits as a result of Madoff's fraud. Such losses are relevant in weighing the fairness and relative equities of the parties in considering an award of prejudgment interest to the Trustee,⁴ where the Defendants must be treated as innocent victims of the fraud.</p>
21-A	1997 Mann Tax Return	0001453-1561		Relevancy; Lack of Probative Value	<i>See</i> Response re No. 20-A above.
21-B	1998 Mann Tax Return	0001563-1697		Relevancy; Lack of Probative Value	<i>See</i> Response re No. 20-A above.
21-C	2000 Mann Tax Return	0001695-1797		Relevancy; Lack of Probative Value	<i>See</i> Response re No. 20-A above.
21-D	2001 Mann Tax Return	0001798-1951		Relevancy; Lack of Probative Value	<i>See</i> Response re No. 20-A above.
21-E	2002 Mann Tax Returns	0001952-2110		Relevancy; Lack of Probative Value	<i>See</i> Response re No. 20-A above.

⁴ *Wickham*, 955 F.2d at 834.

	DOCUMENT DESCRIPTION	BATES NO.	STIPULATED JX-NO.	TRUSTEE'S OBJECTION(S)	RESPONSE
	TRUSTEE EXHIBITS				
22-A	1/1/2001 BLMIS letter to Bank of NY	MESTABL00005744	Stipulated		
23-A	1/1/2001 BLMIS letter to NSCC	MADTEE00544438	Stipulated		
24-A	1/1/2001 BLMIS letter to OCC	MADTEE00544720– 4730	Stipulated		
25-A	1/1/2001 BLMIS letter to DTC	MESTABL00005745	Stipulated		

The Defendants reserve the right to rely upon and introduce any of the Trustee's exhibits, to amend or supplement their above responses and their foregoing list of exhibits at any time prior to the time of trial, to identify additional exhibits for purposes of rebuttal or impeachment, to identify additional exhibits when permitted access to counsel's office, whether or not designated herein, and to further supplement the Defendants' list of exhibits as necessary in connection with the Trustee's exhibits.

Dated: June 30, 2020
New York, New York

DENTONS US LLP

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